



IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

JUL - 2 2020

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

ULISES RENE RODRIGUEZ -HERNANDEZ GAMBOA,)
AND, JANER PEREZ-CARRASCO)

Plaintiffs,)

vs.)

HEARTLAND EXPRESS)

Defendant,)

CJ-2020 02077

Case No.:

DAMAN CANTRELL

Judge

PETITION

COMES NOW the Plaintiffs, Ulises Rene Rodriguez-Hernandez Gamboa, and Janer Perez-Carrasco, and for their causes of action against the Defendant, Heartland Express, alleges, and states as follows:

1. The Plaintiffs are residents of Tulsa County, State of Oklahoma.
2. The Defendant, Heartland Express, is a Iowa corporation and is believed to be registered to do business in Oklahoma.
3. The incident involved in this action occurred in Tulsa County, State of Oklahoma.
4. This Court has jurisdiction over both the subject matter and the parties herein and is the proper venue for this action.
5. On or about July 6, 2018, Michael Dickson was an employee of the Defendant, Heartland Express, and was driving a vehicle owned by the Defendant, which was traveling north on U.S highway 75 when he negligently struck the Plaintiffs' who were lawfully working on the highway with warning procedures in place.

EXHIBIT

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6. Plaintiff, Ulises Rene Rodriguez-Hernandez Gamboa was injured.

7. Plaintiff, Janer Perez Carrasco was injured.

CLAIM OF ULISES RENE RODRIGUEZ-HERNANDEZ GAMBOA

8. As a result of the collision involved in this action, the Plaintiff, Ulises Rene Rodriguez-Hernandez Gamboa, sustained injuries for which he has incurred medical expenses for treatment of his injuries to date. The Plaintiff may continue to incur additional medical expenses as a direct result of this collision.

9. As a result of the negligence of the Defendant, the Plaintiff, Ulises Rene Rodriguez-Hernandez Gamboa, has sustained physical and mental pain and suffering and may continue to sustain such damages in the future.

10. As a result of the negligence of the Defendant, the Plaintiff, Ulises Rene Rodriguez-Hernandez Gamboa has suffered temporary and permanent physical impairment which has resulted in loss of wages and loss of future earning capacity.

11. The foregoing collision and the damages sustained by the Plaintiff, Ulises Rene Rodriguez- Hernandez Gamboa, are a direct result of the improper and negligent actions of the Defendant.

CLAIM OF JANER PEREZ CARRASCO

8. As a result of the collision involved in this action, the Plaintiff, Janer Perez Carrasco, sustained injuries for which he has incurred medical expenses for treatment of his injuries to date. The Plaintiff may continue to incur additional medical expenses as a direct result of this collision.

9. As a result of the negligence of the Defendant, the Plaintiff, Janer Perez Carrasco, has sustained physical and mental pain and suffering and may continue to sustain such damages in the future.

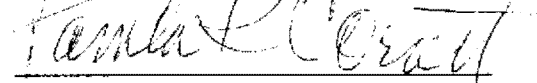
10. As a result of the negligence of the Defendant, the Plaintiff, Janer Perez Carrasco, has suffered temporary and permanent physical impairment which has resulted in loss of wages and loss of future earning capacity.

11. The foregoing collision and the damages sustained by the Plaintiff, Janer Perez Carrasco, are a direct result of the improper and negligent actions of the Defendant.

WHEREFORE, Plaintiffs, each individually, prays for judgment against Defendant, Heartland Express for damages in a sum exceeding Seventy-Five Thousand Dollars (\$75,000.00), for prejudgment and post-judgment interest, for the costs of this action, and for such other and further relief as to which Plaintiffs may show themselves entitled.

Respectfully submitted,

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**JURY TRIAL DEMANDED
ATTORNEY'S LIEN CLAIMED**